## **EXHIBIT A**

## IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

SCHREINER UNIVERSITY,	§	
	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO. 5:24-cv-20-FB-ESC
	§	
COMPASS GROUP USA, INC. d/b/a	§	
CHARTWELLS,	§	
	§	
Defendant.	§	
	§	
	§	
	§	

## SCHEDULING RECOMMENDATIONS

The parties recommend that the following deadlines be entered in the scheduling order to control the course of this case:

- 1. The parties shall complete ADR in compliance with Local Rule CV-88 by October 8, 2024. A motion objecting to ADR must be filed no later than August 8, 2024.
- 2. The parties asserting claims for relief shall submit a written offer of settlement to opposing parties by <u>April 5, 2024</u>, and each opposing party shall respond, in writing, by <u>April 19, 2024</u>.
- 3. The parties shall file all motions to amend or supplement pleadings or to join additional parties by May 10, 2024.
- 4. All parties asserting claims for relief shall file their designation of testifying experts and shall serve on all parties, but not file the materials required by Fed. R. Civ. P. 26 by <u>July 3, 2024</u>. Parties resisting claims for relief shall file their designation of testifying experts and shall serve on all parties, but not file the materials required by Fed. R. Civ. P. 26 by <u>August 17, 2024</u>. All designations of rebuttal experts shall be designated within 14 days of receipt of the report of the opposing expert.
- 5. An objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony, within  $\underline{30}$  days of receipt of the written report of the expert's proposed testimony, or within  $\underline{30}$  days of the expert's deposition, if a deposition is taken, whichever is later.

- 6. The parties shall complete all discovery on or before <u>October 1, 2024</u>. Counsel may by agreement continue discovery beyond the deadline, but there will be no intervention by the Court except in extraordinary circumstances, and no trial setting will be vacated because of information obtained in post-deadline discovery.
- 7. All dispositive motions shall be filed no later than October 31, 2024. Dispositive motions and responses to dispositive motions shall be limited to 20 pages in length.
- 8. The trial date will be determined at a later date by the Court. The parties shall consult Local Rule CV-16 regarding matters to be filed in advance of trial. At the time the trial date is set, the Court will also set the deadline for the filing of matters in advance of trial.
- 9. All of the parties who have appeared in the action conferred concerning the contents of the proposed scheduling order on January 23, 2024, and the parties have agreed as to its contents.

Dated: February 6, 2024

/s/ Lynne Clarke (by permission)

William H. Chamblee
State Bar No. 04086100
wchamblee@cr.law
Lynne P. Clarke
State Bar No.04316750
lclarke@cr.law
CHAMBLEE RYAN, P.C.

2777 Stemmons Freeway, Suite 1257 Dallas, Texas 75207

Dallas, Texas 13201

(214) 905-2003 (Telephone)

(214) 905-1213 (Facsimile)

Attorneys for Schreiner University

Respectfully submitted,

/s/ Michael Burns

Michael Burns

Admitted Pro Hac Vice

HILGERS GRABEN PLLC

601 Pennsylvania Ave. N.W.

South Building, Suite 900

Washington, D.C. 20004

Telephone: 202-985-1664

Facsimile: 402-413-1880

mburns@hilgersgraben.com

AND

Bradley A. Monk
Texas Bar No. 24077502
Grant Schmidt
Admitted Pro Hac Vice
HILGERS GRABEN PLLC
7859 Walnut Hill Lane, Suite 335
Dallas, Texas 75230
Telephone: 469-289-2751

Facsimile: 402-413-1880 bmonk@hilgersgraben.com gschmidt@hilgersgraben.com

Attorneys for Defendant

## **CERTIFICATE OF SERVICE**

On February 6, 2024, I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Michael Burns
Michael Burns